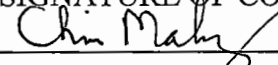



CRIMINAL COMPLAINT

United States District Court United States of America v. Bobby Austin Tyler Toms : DOB:1997; U.S. Citizen Ciera Colleen Hancock : DOB:1997; U.S. Citizen	DISTRICT of ARIZONA DOCKET NO. MAGISTRATE'S CASE NO. <div style="text-align: center; font-size: 1.2em; font-weight: bold;">19-03313MJ</div>
Complaint for violation of Title 8 United States Code § 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: On or about July 18, 2019, at or near Why, in the District of Arizona, Bobby Austin Tyler Toms and Ciera Colleen Hancock named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to transport a certain illegal alien, Maricela Rios-Olivares, and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii); 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i).	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: On July 18, 2019, Border Patrol agents observed an individual walk out from the brush near a gas station in Lukeville, Arizona, talking on her cell phone. She entered the store until a gray Volkswagen Jetta arrived at the gas station and she got into the vehicle. Agents followed the vehicle as it left the gas station traveling north on State Route (SR) 85. Agents followed the vehicle to the immigration checkpoint on SR 85 where the driver and registered owner was identified as Bobby Austin Tyler Toms and Ciera Colleen Hancock was identified as the passenger. When asked where they were coming from, Toms stated that they were returning from sight-seeing near Lukeville. The agent then looked in the back seat of the vehicle and observed the purse that he had seen the individual carrying at the gas station parking lot, but did not see her in the vehicle. The vehicle was referred to secondary inspection. Agents asked Toms if anyone was in the trunk and he stated, "No." Agents opened the trunk and found Maricela Rios-Olivares, an illegal alien from Mexico, inside the trunk. Agents noted Rios-Olivares appeared a bit disoriented and sweaty as she exited the trunk. Post-Miranda, Hancock stated that she was offered \$2,000 per person to pick up three illegal aliens. Upon arrival in Lukeville, only one female got into the vehicle. Hancock stated she was instructed to put Rios-Olivares into the trunk. Hancock stated that Toms was her driver and that he had smuggled illegal aliens in the past. Hancock stated she was aware of Rios-Olivares' citizenship status. Hancock stated that she was going to split the \$2,000 with Toms evenly. Material witness Maricela Rios-Olivares stated that she made arrangements to be smuggled into the U.S. from Mexico in exchange for money. She entered through a hole in the fence from Mexico near Lukeville, and was instructed by cell phone that a gray vehicle would pick her up. She observed the gray vehicle and the male driver told her to get into the vehicle. Rios-Olivares stated that Hancock instructed her to get into the trunk. Rios-Olivares stated that Hancock closed the trunk after she climbed inside. Toms and Hancock were taking her to Phoenix, Arizona, and she was to pay the driver of the vehicle the remaining \$11,000 upon arrival in Phoenix.	
MATERIAL WITNESS IN RELATION TO THE CHARGE: Maricela Rios-Olivares	
DETENTION REQUESTED <i>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</i> RW/drh AUTHORIZED AUSA Rui Wang	SIGNATURE OF COMPLAINANT  OFFICIAL TITLE Special Agent
Sworn to before me and subscribed in my presence.	
SIGNATURE OF MAGISTRATE JUDGE ¹⁾ 	DATE July 19, 2019

1) See Federal rules of Criminal Procedure Rules 3 and 54